

Federal Energy Regulatory Commission

Reliability Technical Conference

June 27, 2019

Docket No. AD19-13-000

Remarks of Commissioner Jordan White, Utah Public Service Commission, on behalf of the Western Interconnection Regional Advisory Body (WIRAB)

Good afternoon Chairman and Commissioners. My name is Jordan White. While I serve as a Commissioner on the Utah Public Service Commission, I am here today representing the Western Interconnection Regional Advisory Body (WIRAB). I appreciate this opportunity to share WIRAB's views on the important subject of reliability within the Western Interconnection.

In 2005, the Western Governors' Association passed a policy resolution directing establishment of WIRAB that reads in part:

The creation of WIRAB is necessary to ensure that the public interest is fully represented in the decisions on the reliability of the Western grid. It will help ensure that reliability standards implemented for the Western Interconnection reflect an appropriate balance between the benefits of a reliable grid and the costs of achieving reliability; costs that Western consumers will bear.

Upon petition of 10 western governors, WIRAB was created by FERC in 2006:

- WIRAB represents all states and provinces of the United States, Canada, and Mexico with territory in the Western Interconnection;
- Because WIRAB is organized interconnection-wide, FERC may give deference to WIRAB's advice.
- WIRAB is the only regional advisory body in the United States established under Section 215(j) of the Federal Power Act;
- WIRAB has statutory authority to provide advice to FERC, NERC, and WECC on bulk electric system reliability matters in the Western Interconnection; and

Beyond the weight of WIRAB's statutory authority, all appointed WIRAB members represent the public interest of their respective states and provinces. WIRAB speaks with a united voice on behalf of all the states and provinces of the Western Interconnection to advise FERC, NERC, and WECC on bulk electric system reliability matters.

WIRAB works hard to achieve consensus among all its states and provinces before weighing in and submitting advice. Instead of simply reporting majority and minority views, WIRAB puts in the time and effort to arrive at a unified position that represents the perspective of all members. In practice, if a state or province objects to a specific recommendation—the recommendation is deleted if consensus cannot be reached. In my view, it’s hard to find this type of united voice in the Western Interconnection—and this is what makes WIRAB unique.

In 2017, WIRAB commissioned a report titled “A Framework for Considering Multiple Reliability Coordinators in the Western Interconnection”¹ that outlined a method to objectively review and assess the reliability and cost implications of a transition from a single Interconnection-wide RC (with the one exception of the Alberta Electric System Operator or AESO²) to multiple RCs with smaller footprints. The report specifically identified the tools and technologies used by Peak Reliability (“Peak”) to not only comply with minimum Reliability Standards but to exceed them. Peak maintained that these tools were necessary to provide high-quality situational awareness in the Western Interconnection. WIRAB agrees and its report underscores the crucial need to maintain these tools and technologies to assure the same level of reliability as the West moves further into a multi-RC environment.

Today, WIRAB is actively observing the transition and certification of the new RCs in the Western Interconnection. Because WIRAB’s primary focus has been the strategic policy direction of the RCs, it has encouraged the new RCs to strive for exceptional performance above and beyond compliance with the minimum NERC Reliability Standards. WIRAB is pleased that some of the tools Peak created such as the Enhanced Curtailment Calculator and the Western Interconnection Model are being evaluated by the new RCs.

However, there is one tool that Peak developed that has received little attention from the new RCs. Namely, Peak developed a robust and effective set of performance metrics which not only measured how well Peak performed the RC function, but also measured the quality of the information being provided by Balancing Authorities and Transmission Operators.

Over time, Peak invested a significant amount of time and resources in establishing its performance metrics and made a concerted effort to affect behavioral change within the Western Interconnection. For example, Peak improved its Operational Excellence Days performance metric, which was considered by the North American Transmission Forum to be a “Best Practice.” By reviewing its engineering, operations, information technology, and other practices, Peak was able to move beyond the minimum standards to encourage improved performance among entities in the West. Peak emphasized with entities that high-quality load forecasting and outage submittals were needed to conduct high-quality next day studies and to be prepared for real-time contingencies. Peak used the information it compiled to encourage better information

¹ A copy of the report may be accessed on WIRAB’s website at: <https://westernenergyboard.org/wirab/documents/>

² AESO has provided Reliability Coordinator service for Alberta, Canada and has expressed its intent to continue the provision of such service. AESO has a robust reliability plan, including compliance with a suite of reliability standards and a high level of performance and reliability.

from the BAs and TOPs. Ultimately, Peak’s efforts raised the level of performance of all of their related operational entities in the West.

WIRAB believes the loss of ongoing monitoring and reporting of new RC performance threatens the ability to maintain or improve the overall level of reliability in the West.

WIRAB respectfully requests the Commission and ERO leadership encourage new RCs in the West to establish voluntary, best-practice performance metrics similar to those developed by Peak.³ In an effort to maintain or improve the overall level of reliability in the West, WIRAB believes that new RCs should also conduct transparent evaluations of operational performance and identify best practices. Consistent metrics across the RCs will not only provide the necessary data to improve reliability, they will demonstrate if reliability has diminished during this transition.

I appreciate the Commission’s focus on this important topic. I look forward to a productive conversation about Reliability Coordination in the Western Interconnection as WIRAB strives to encourage reliability excellence beyond compliance with minimum NERC Reliability Standards. I’d be happy to take any questions.

Submitted on June 14, 2019.



Jordan White
Commissioner
Utah Public Service Commission
On behalf of the Western Interconnection Regional Advisory Body

³ The federal Government Accountability Office defines performance measurement as “the ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals.” It is a recurring process, not just a one-time act, which requires monitoring and establishing benchmarks to serve a useful function and with which to compare progress over time.