WIRAB Comments on the
Final Draft Universal Data Sharing Agreement
December 4, 2015

The Western Interconnection Regional Advisory Body (“WIRAB”) appreciates the opportunity to submit comments to the Peak Reliability Board of Directors on Peak’s draft Universal Data Sharing Agreement (“UDSA”).

WIRAB acknowledges the hard work undertaken by Peak, its members and the Data Sharing Work Group to get to an agreement that all signatories would be willing to execute. Nevertheless, WIRAB continues to believe the Data Sharing Review Process outlined in Exhibit A is seriously flawed. We continue to believe that our alternative data sharing review proposal is superior to the draft under consideration.

At a minimum, WIRAB recommends two modifications to the proposed UDSA. First, Peak should have an expanded role in the data sharing review process. Peak Staff should independently evaluate any third party data request and make public its findings, conclusions, and recommendations. Peak Staff should determine the proper categorization of the data, assess whether the data request is valid, and whether the data requestor is viable. Although Peak Staff findings and recommendations would not be binding, it would provide critical and useful information for decisions on third party requests. This type of independent analysis from Peak Staff is completely within the confines of the proposed Data Sharing Review Process and would benefit all parties in the process.

Second, WIRAB believes that Peak should ask for more than objections from members when it releases a notice of a third party data request. Currently, Section II.B of the Data Sharing Review Process in Exhibit A states:

“Comments should include:

1. Objection to the data request or Peak’s categorization of the Requested Data;
2. The specific rationale for any objections, such as reliability, security, or use (such as electric market competitiveness) reasons; and
3. Any reduced data set that would be acceptable, given the objections.”

WIRAB is concerned that this objection process is unbalanced and one-sided. Peak should also seek affirmative comments on its categorization of the requested data and comments that support granting the third party data request. If a majority of Peak’s members do not object to a request and simply remain silent, it will be difficult to determine whether industry subject matter experts agree with the underlying rationale for a specific objection or whether a reduced data set is a reasonable response. The silent majority could simply have failed to consider the specific concern raised by an objector; or alternatively, the subject matter experts may have
considered the concern and decided that it did not merit an objection. Asking for both objections and affirmative comments builds a better record for a decision on the third party request.

WIRAB looks forward to constructively working with Peak to improve its implementation of the Data Sharing Review Process in the future.